

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re:

PEKINPAUGH, MICHAEL,

Debtor(s).

Case No. 11-15107 SAH

Chapter 7

TRUSTEE'S MOTION TO REOPEN BANKRUPTCY

AND

BRIEF IN SUPPORT THEREOF

AND

NOTICE OF OPPORTUNITY FOR HEARING

COMES NOW, John D. Mashburn, former Trustee herein, and pursuant to 11 U.S.C.A. ¶ 350(b) of the Bankruptcy Code and Rule 5010 of the Fed.R.Bankr.P., moves for an Order reopening the above-captioned case and directing the United States Trustee to reappoint a Trustee to administer the Estate herein for the reason that assets have been recovered that should be administered for the Estate.

Respectfully submitted,

s/ John D. Mashburn

JOHN D. MASHBURN, OBA#12763

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ATTORNEY FOR TRUSTEE

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than fourteen (14) days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 14 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006. service.

CERTIFICATE OF SERVICE

This is to certify that, on the day of filing this document with the Clerk of the Court as indicated above, I electronically transmitted the foregoing document to the Clerk of the Bankruptcy Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the all ECF registrants for this case.

/s/ John Mashburn
JOHN MASHBURN